

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Roosevelt Mealing

Jr \_\_\_\_\_

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

City of Aiken S.C

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

**Complaint for Violation of Civil Rights**

(Non-Prisoner Complaint)

Case No. \_\_\_\_\_

*(to be filled in by the Clerk's Office)*

Jury Trial:     ☒ Yes     ☐ No  
*(check one)*

ROVD - USDC OF LA SC  
FEB 27 '25 AM 8:59

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Mealing Roosevelt  
 Street 333huber\_clay\_rd\_langley Only use poBox 1282 Langley S.C. Address 29834  
 City Langley and S.C. County 29834  
 State 7069411847 and ZipCode 29834  
 Telephone Number \_\_\_\_\_

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name city\_of\_aiken  
 Job \_\_\_\_\_ or \_\_\_\_\_ Title \_\_\_\_\_  
111chesterfield\_st\_s  
 \_\_\_\_\_ (if known)  
 Street \_\_\_\_\_ Address \_\_\_\_\_  
aiken  
 City \_\_\_\_\_ and \_\_\_\_\_ County \_\_\_\_\_  
S.C. 29801

State \_\_\_\_\_ and Zip \_\_\_\_\_ Code \_\_\_\_\_  
\_\_\_\_\_ 8036427654 \_\_\_\_\_

Telephone Number \_\_\_\_\_

8036427654

☐ Individual capacity

☐ Official capacity

Defendant No. 2

Name \_\_\_\_\_

Job or Title \_\_\_\_\_

(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity

☐ Official capacity

Defendant No. 3

Name \_\_\_\_\_

Job or Title \_\_\_\_\_

(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity

☐ Official capacity

Defendant No. 4

Name \_\_\_\_\_

Job or Title \_\_\_\_\_

(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

☐ Individual capacity

☐ Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- ☐ Federal officials (a *Bivens* claim)  
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

City of Aiken  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

A fifth Amendment and Title VII of the civil rights act  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

\_\_\_\_ The events happend working for the city of aiken please see attatchments \_\_\_\_\_

B. What date and approximate time did the events giving rise to your claim(s) occur?

\_\_\_\_\_ it all started about in july 2023 and stop on july of 2024 they took my pay and stated we should fire you \_\_\_\_ they gave me time off in june and wrote me up they gave me time off in april and wrote me up and its no name on some \_\_\_\_\_ write \_\_\_\_\_ ups  
 \_\_ it got outrageous after my feb 2024 evaluation \_\_\_\_ please see attatchment \_\_\_\_\_

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

\_\_\_\_ they took my money and stated we should fire you thats y i had to resign i had to proform slave like duites and i was hire as a Class a vehicle operator

\_\_\_\_ reminder i ask for help and things got worst see attatchments the guys that seen things was troy spann mr tool chip keon randy and i

have pictures because the city of aiken WILL LIE MAJORITY OF MANGEMENT WILL LIE TO MISLEAD THE TRUTH Maliek told me before i had toresign that they pulled him in office and talked about making him.

please see attatchment. *Reminder Alot of guys i didn't know names in discovery i will go in depth.*

## Attachment A

To whom this may concern. My name is Roosevelt Mealing I started working for the city of Aiken. I got interview for class. A CDL position in January. The guys that interviewed me was Troy, Ben And Brian, During the interview. They stated that I would be. Driving trucks majority of the time. Troy, Spann Was present in the interview. I probably started the job on. february 2023. It was a horrible experience. I never believed that a person would have to endure the things that I endured during the time I worked for the city of Aiken. It went from digging holes to cleaning shit They put everybody involved in my medical file. And I also got written up. For apparently no reason. After they would tell me it was OK to take days off, they would write me up. They also would write me up for doing the job that I did. So it was clearly that I was getting harassed. And retaliated against once I started saying I felt that they were being racist. Clearly, I did not get treated fairly. That is the reason why I'm pursuing this lawsuit. I have Pacific dates. That I felt that I was getting harassed, that sabotaged equipment. There was forcing me to do jobs that I wasn't entitled to do and wasn't even training for, dealing with chemicals that I wasn't even training for. I kept the Pacific date. When I reported it, I was getting mistreated, things got even worse. I took pictures of how they were sabotaging my equipment. They were doing all they could do to get me to quit. I went to Human Resources. Told him to keep the information confidential. They went and told everyone that Lady name was Tracy Lott. I showed her the photos of how I felt I was getting mistreated and how. On certain holidays I will have to work and they will sabotage the day just so I would have to stay longer. They placed me on call and when I originally took the job. He stated that I would not have to do call Any negativity that the City of Aiken would present would be false or try to mislead the court. I was a faithful employee, did not call out. I came to work and did my job to the best of my ability, but they kept adding on, adding on and adding on. The first incident that I noticed was outrageous was they asked me to go get. The Class A. Tractor. With the trailer. To get the tires changed. And when I arrived at the store. They had a car part. To the right. To try to get me the rear end of the car, it was parked at the facility where we had two people that was already there to make sure that everything was straight. I have photos of this because I thought it was kind of odd that. No one would ask them to move the car before I showed up. I was forced to resign. Due to the fact they kept harassing me, I would have meetings with the assistant city manager. And he would say one thing and once I do what he would say, they would add more and say I did something wrong. He said it. It was a debate for us to let you come back to work once they told me to leave and do not give me no right up. They give me a write up when I return to work after a guy asked me to leave because I explained to him I was not feeling well when he asked me to get on the jet truck. That any person with a regular. License could operate. That was part of the harassment. I have clear evidence to show that I was getting harassed. At one point I was digging and some guy yelled at go ahead and dig boy. Like I was some sort of slave. I was presented several write ups right before I decide within the last six months right before I decide to resign. The write ups did not have a name on who was writing me up. That was clearly harassment to try to get me to quit. And they was pursuing like they were trying to fire me. During that time, they asked me to get on the jet truck once again. To clean up feces and the gold iron, storm drains and sewer lines when I only signed up to work in the water department to hook up water lines and with the Class A. CDL license. throughout this, I'm trying to show how I was getting harassed. Please, if you look at my acceptance. Is strictly saying water department that is the reason why I did not have to take a hepatitis B shot, So once they decide to put me on the sewer truck, which anyone could operate if you have a regular license, I asked Lex. All harassment

was due to racism. I mean, I went to human resources. I stated who would who would admit that they are being racist? I feel everything that was going on with me was 100% racism. I explained no one that was on my pay scale was going through the things I was going through. I was the only black man going through the things at the city of Aiken. In my department. That's why I told human resources that it was racism.

Further More. I have at least two write ups that do not states who are writing me up that clearly shows is harassment and racism. I went to Jonathan Peoples. And ask him what is going on, why am I having so many problems? He stated. That's what happened when you rub people the wrong way. I said who are you talking about? He said. The people you went and reported that he was getting mistreated. The dates that I have that I felt that it was racism and harassment was approximately from July of 2023 to July of 2024. I have a year's worth of dates and document. Dates to show out again. Mistreated racism or harassed?

Not to put me back on it due to the fact that when I was hired I was only hired for the water department. He said he would look into that. Lex s clearly went to supervisors and stated that what me and him had talked about, they got. Very disrespectful and wrote me up over the entire conversation that me and Lex originally talked about. Lex is a white guy. That is the assistant. city manager. That's why I must was clearly racism because he changed his whole attitude towards me once he went and talked to other individuals. I only tells the truth. I'm not going to lie at all about what was going on. I am willing to show evidence. That I did what they ask of me. And still was receiving write ups. I will be working hard and others will stand around and watch. I have the evidence to support everything that I stated was harassment, disrespect. And racism. The guy, the guys who I went to for help were all white. No one came to help me. I went to the EEOC. I went to Human Resources for the city of Aiken. No one came to support me at all. So I would like for the court. To give me a fair trial. And I'm looking to be compensated. With \$10 million. Due to the fact no organization could get me no mediation. Our new settlement. That would have prevented me from going this far. It i countless events. that took place. That I felt in an awkward situation. No law abiding citizen should have to endure the disrespect AND RACISM that I endured working for the city of Aiken.

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**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

my mental state is gone this job was a horrible  
experience

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

For Relief i have a question for the court if you sign up to work a job with fresh clean water and because mangers get upset with truth they force you to deal or clean up feces to be disrespectful please what would



you\_want\_i\_am\_seeking\_relief\_from\_ever\_wrking\_again\_10\_million\_dollars\_\_\_\_\_

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\_\_\_\_\_

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: February 28, 2025

Signature of Plaintiff

Printed

Name

of

Plaintiff

Roosevelt Mealing

### B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_